

1 The Law Offices of Robert Nadalin  
2 P.O. Box 124594  
3 San Diego, CA 92112  
(619) 234-8875

4 Robert G. Nadalin, Esq.  
5 Cal. State Bar No. 222489  
6 Attorney for Ms. Roshni Sundaram

7 UNITED STATES DISTRICT COURT  
8 SOUTHERN DISTRICT OF CALIFORNIA

8 Roshni Sundaram,	Civil No. 08cv1131 DMS BLM
9	
10 Plaintiff,	Agency No. A95 583 083
11	
12 v.	MOTION FOR VOLUNTARY
13	DISMISSAL OF SUIT
14 Michael Chertoff, Secretary,	
15 Department of Homeland Security,	
16 et al.	
17	
18 Defendants.	
19	

20 Roshni Sundaram, by and through her attorney of record, Robert G. Nadalin, Esq.,  
21 hereby files this motion for voluntary dismissal of his complaint without prejudice  
22 pursuant to Federal Rule of Civil Procedure 41.

23 Ms. Sundaram sought relief from this court because of an unreasonable delay in the  
24 adjudication of an application for adjustment of status to lawful permanent residence.  
25 That case has now been approved and Ms. Sundaram is now in possession of her lawful  
26 permanent resident card. Therefore, this matter has become moot and Ms. Sundaram now  
27 moves for voluntary dismissal, without prejudice, of her complaint.

28 DATED: July 18, 2008

Respectfully submitted,

s/ Robert G. Nadalin

Robert G. Nadalin, Esq.  
Attorney for Roshni Sundaram

1 The Law Offices of Robert Nadalin  
2 P.O. Box 124594  
3 San Diego, CA 92112  
(619) 234-8875

4 Robert G. Nadalin, Esq.  
5 Cal. State Bar No. 222489  
Attorney for Ms. Roshni Sundaram

6 UNITED STATES DISTRICT COURT  
7 SOUTHERN DISTRICT OF CALIFORNIA

8 Roshni Sundaram, | Civil No. 08cv1131 DMS BLM

9 Plaintiff, |

10 | Agency No. A95 583 083

11 v. |

PROOF OF SERVICE

12 Michael Chertoff, Secretary, |  
13 Department of Homeland Security, |  
14 et al. |

15 Defendants. |  
16

17 I, Robert G. Nadalin, attorney for Ms. Roshni Sundaram, Plaintiff in this action, a citizen  
18 of the United States over the age of eighteen years and a resident of San Diego County,  
19 California with business street address being 110 West C St., Suite 1300, San Diego,  
20 California 92101, and postal address as noted above, and not a party to the above-entitled  
action, hereby certify that on March 10, 2008, I caused to be served a copy of the:  
MOTION FOR VOLUNTARY DISMISSAL OF SUIT.

21 by electronic filing the foregoing with the Clerk of the District Court using its ECF  
22 System, which electronically notifies them.

23 Megan Callan Esq.  
24 Counsel for Defendants  
megan.callan@usdoj.gov

25 I declare under penalty of perjury that the foregoing is true and correct.

26 Executed on July 18, 2008  
27

28 s/Robert G. Nadalin  
Attorney for Plaintiff  
E-mail: robert@nadalinelaw.com